

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

IN RE NII HOLDINGS, INC.
SECURITIES LITIGATION

Case No. 1:14-cv-00227-LMB-JFA

**NOTICE OF FILING OF AMENDED COMPLAINT
PURSUANT TO FED. R. CIV. P. 15(a)(1)**

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 15(a)(1), Lead Plaintiffs are filing herewith the Second Amended Class Action Complaint for Violations of Federal Securities Laws (the “SAC”), which incorporates certain non-public information that was not previously alleged in the Amended Class Action Complaint for Violations of Federal Securities filed on June 27, 2014 (the “Complaint”).¹ This information came to Lead Counsel’s attention without sufficient time to confer with counsel for NII Holdings regarding their position concerning the possible confidential or proprietary nature of this company-specific information before June 27, 2014 and therefore was not included in the Complaint. Since June 27, 2014, Lead Counsel has conferred with counsel for NII Holdings, provided counsel for NII Holdings with copies of the non-public information Lead Counsel has included in the SAC, and confirmed with counsel for NII Holdings that they would not seek to file under seal the non-public information Lead Counsel has included in the SAC.

¹ Iron Workers District Council of New England Pension Fund and State-Boston Retirement System, plaintiffs and putative class members filed the initial complaint in this action on March 4, 2014. On June 10, 2014, the Court appointed Danica Pension, Livsforsikringsaktieselskab, Industriens Pensionsforsikring A/S, Operating Engineers Pension Trust Fund, the IBEW Local No. 58 / SMC NECA Funds, and Jacksonville Police and Fire Pension Fund as Lead Plaintiffs pursuant to 15 U.S.C. § 77z-1(a)(3)(B) and 15 U.S.C. § 78u-4(a)(3)(B)(v). The Complaint is the first and only prior pleading filed by the Lead Plaintiffs in this action. Under Fed. R. Civ. P. 15(a)(1), Lead Plaintiffs may amend the Complaint within 21 days of filing it, or on or before July 18, 2014. Counsel for NII Holdings has advised Lead Counsel that counsel for Defendants NII Holdings and counsel for Steven M. Shindler, Steven P. Dussek and Gokul Hemmady take no position on this notice of filing.

Dated: July 18, 2014

Respectfully submitted,

By: /s/ Susan R. Podolsky

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on July 18, 2014.

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